

1 SO. CAL. EQUAL ACCESS GROUP
Jason J. Kim (SBN 190246)
2 Jason Yoon (SBN 306137)
Kevin Hong (SBN 299040)
3 101 S. Western Ave., Second Floor
Los Angeles, CA 90004
4 Telephone: (213) 205-6560
cm@socaleag.com

5 Attorneys for Plaintiff
6 MARQUISE BAILEY

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

10 MARQUISE BAILEY,

11 Plaintiff,

12 vs.

13
14 SUSANA CARIDAD MULET D/B/A
SPORTS BAR; FEDERICO ULLOA; and
15 DOES 1 to 10,
16 Defendants.
17

Case No.: 2:24-cv-08789-GW (PDx)

**NOTICE OF VOLUNTARY
DISMISSAL OF ENTIRE ACTION
WITHOUT PREJUDICE**

18
19 **PLEASE TAKE NOTICE** that MARQUISE BAILEY (“Plaintiff”) pursuant to
20 Federal Rule of Civil Procedure Rule 41(a)(1) hereby voluntarily dismisses the entire
21 action *without prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) which
22 provides in relevant part:

23 **(a) Voluntary Dismissal.**

24 (1) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and 66
25 and any applicable federal statute, the plaintiff may dismiss an action
26 without a court order by filing:

27 (i) A notice of dismissal before the opposing party serves either an
28 answer or a motion for summary judgment.

1 None of the Defendants has either answered Plaintiff's Complaint, or filed a motion for
2 summary judgment. Accordingly, this matter may be dismissed without an Order of the
3 Court.

4
5 DATED: January 6, 2025

SO. CAL. EQUAL ACCESS GROUP

6
7
8 By: /s/ Jason J. Kim
9 Jason J. Kim, Esq.
10 Attorneys for Plaintiff
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28